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MAR 21 2014
United States Bankruptcy Court
San Jose, California

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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA – DIVISION 5**

In Re: JAMES MADISON KELLEY, Debtor	Chapter 11 Adv. Case No. 10-05245
JAMES MADISON KELLEY Plaintiff V. JPMORGAN CHASE BANK, NA, WASHINGTON MUTUAL BANK, DOES (1-20)	30B6 DEPOSITION SUBPOENA For JPMorgan Chase Bank, NA Honorable Arthur S. Weissbrodt March 20, 2014

1 **30B6 DEPOSITION SUBPOENA OF JPMORGAN CHASE BANK, NA**

2
3 **PLEASE TAKE NOTICE** that, pursuant Federal Rule of Civil Procedure 30(b)(6),
4 Plaintiff James Madison Kelley hereby notices this deposition of Defendant JPMorgan
5 Chase Bank, NA designated expert(s) under Rule 31(a)(4) and any participating
6 subsidiaries on the topics relevant to this adversary case under Rule 31(a)(4).

7 **DATE/TIME:** April 21, 2011 10:00:00 AM

8 **WITNESS:** 30(b)(6) Designee
9 Adversary Case # 10-05245

10 **LOCATION:** Executive Suite 100,
2900 Gordon Avenue, Suite 100
11 Santa Clara, CA 95051

12 **Obligation to Investigate and Prepare**

13
14 Please note that, under FRCP 30(b)(6), JPMorganChase Chase Bank, NA and its
15 designated witness(s) have an obligation to **investigate and prepare** to testify on the
16 designated topics. See *Calzaturificio S.C.A.R.P.A. V. Fabiano Shoe Company, Inc.*, 201
F.R.D. 33 (D.Mass 2001), and cases cited therein.

17 **Definitions**

18 As used in this Subpoena, the term "identify" means, without limitation, to
19 specify the name of any entity or person, the title of any document, the author of any
20 document, the name of any authorizing person, the name of anyone issuing a power of
21 attorney, etc. and their current position, title, professional credentials address and
22 telephone number.

23 As used in this Subpoena, the term "document" means, without limitation, the
24 following terms, whether printed or recorded or reproduced by any other mechanical
25 process, or written or produced by hand: agreements, communications, State and Federal
26 governmental hearings and reports, correspondence, faxes, telegrams, memoranda,
27 summaries or records of telephone conversations, summaries or records of personal

1 conversations or interviews, diaries, graphs, reports, notebooks, note charts, plans,
2 drawings, sketches, maps, summaries or records of meetings or conferences, summaries
3 or reports of investigations or negotiations, opinions or reports of consultants,
4 radiographs, photographs, motion picture films, brochures, pamphlets, advertisements,
5 circulars, press releases, drafts, letters, any marginal comments appearing on any
6 document, and all other writings.

7 As used in this Subpoena, the term "**Defendant**" means, without limitation, the
8 responding party.

9 As used in this Subpoena, the term "**You**" means the corporate defendant
10 answering these requests, and any person acting on that corporation's behalf.

11 As used in this Subpoena, the term Loan shall mean **Washington Mutual Bank**,
12 **FA** Loan Number 3018113559.

13 When You are asked to "identify" a particular employee or person, you are to
14 provide that person's full name, current or last job title, professional credentials, and
15 current physical work address if still employed by you; if the person is not still employed
16 by you, provide the last known address, phone numbers, e-mail address or other available
17 contact information.

18 When you are asked to "identify" documents, you are to provide that title of the
19 document, a description of the documents, identify the makers of the document, and
20 provided any information relevant to the deposition question or your statement or answer.

21 All documents, which form the basis for your answers or statements, may be
22 delivered in either electronic form (PDF on DVD preferred) or paper form. If any of the
23 documents cannot be delivered please indicate why.

24 **DOCUMENTS TO BE PRODUCED**

- 25
26 1. Powers of Attorney enabling third parties to Foreclose.
27

1 2. Power of attorney permitting changes in beneficiary from one entity to
2 related to the loans.

3 3. Assignments of Adjustable Rate Note ("ARN").

4 4. Records of the sale or purchase of the ARN.

5 5. Records of the pledging of the ARN.

6 6. Records of the creation securities collateralized by the loan.

7 7. Documents identifying any Entity or individual to which the Note(s)
8 was sold.

9 8. Servicing contracts between CHASE and WMMSC.

10 9. The Mortgage Servicing Platform ("MSP") Corporate Advance History
11 Screen for 2013. (Chase has produced only through the year 2012.)

12 10. Produce documents if any that show that CHASE paid money for Loan
13 # 3018113559.

14 11. Produce the INV1 Screens for Loan # 3018113559.

15 12. Produce the INV1 Screens for Washington Mutual Bank Loan #
16 0747861714.

1 **Topics of Deposition**

2
3 To clarify the topics I wish to cover, I will depose CHASE's "Person Most Qualified"
4 under FRCP 30(b)(6) on these topics:

- 5 1. Reaffirmation of Ms. Landis previous testimony as contained in her deposition.
- 6 2. All of the Mortgage Servicing Platform ("MSP") transactions bearing the 745
7 transaction code for the Washington Mutual Bank FA ("WMBFA") loan
8 3018113559 including the following taken from the Corporate Advance History
9 Screen ("DDCH"):

10 a. Bates JPM002000 – JPM002005 (Corporate Advance History Screens)

- 11 i. The Meaning of "C150 FFIEC WRITEUP";
12 ii. The identity of the C/A PAYEE "16N14";
13 iii. The identity of the C/A PAYEE "10N14";
14 iv. The meaning of "CANV";
15 v. The meaning of "CANV 12 MO ANNIV";
16 vi. The meaning of "LTCO CONVERSION";
17 vii. The meaning of "CNVC";
18 viii. The meaning of "CNVC CONT CON CR LOSS";
19 ix. The Meaning of "C150 FFIEC WRITEUP";

20 b. Explanation of the cause of each of the following transactions in
21 descending chronological order:

- 22 i. 9/25/2012 \$543,370
23 ii. 4/24/2012 \$ 59,950
24 iii. 3/25/2011 \$ 127,250
25 iv. 9/27/2010 \$282,719.91
26 v. 9/24/2009 \$435,716.43
27 vi. 9/24/2009 \$435,716.43
28 vii. 9/23/2009 \$435,716.43

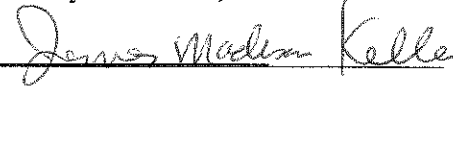
- 29 3. Explain all transactions between Washington Mutual Mortgage Securities
30 Corporation ("WMMSC") and Washington Mutual Bank ("WMB") involving
31 Loan # 3018113559 .

4. Disclose all master servicer account numbers for Loan # 3018113559.
5. Explain all transactions between Washington Mutual Asset Acceptance Corporation ("WMAAC") and WMB for WMBFA loan number 3018113559.
6. Explain all transactions between WMAAC and WMMSC for WMBFA loan number 3018113559.
7. Explain the loan document preparation storage requirements imposed on CHASE with regard to Loan Number 3018113559 as per the WMMSC Servicer's Guide.
8. Explain "document deposit date" in JPM 002015-JPM 002021
9. Explain "image date" in JPM 002021.
10. Explain "Release Notation" in JPM 002020.
11. Explain "Doclist" in JPM 002020
12. Explain "Doclist" in JPM 002020.
13. Explain "Document Deposit Date" in JPM 002019.
14. Explain "Doc Release Date" in JPM 002019.
15. Explain "Document Status Code" in JPM 002018.
16. Explain "Document Status Code" in JPM 002018.
17. Explain "Production Stage Code" in JPM 002018.
18. Identify "Operations Support" JPM 002017.

1
2
3 DATED: March 20, 2014

Respectfully submitted,

4 By:



6 James Madison Kelley

7 Plaintiff/Pro Per

8
9 14390 Douglass Lane

10 Saratoga, California 95070

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11 jmadisonkelley@gmail.com

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PROOF OF SERVICE

I, James Madison Kelley, under penalty of perjury attest that I mailed

30B6 Deposition Subpoena

on 20th day of March 2014 via overnight priority mail to the following people:

John Sorich, esq.
Christopher Yoo, esq.
Thomas Van, esq.

AlvaradoSmith, PC
1 MacArthur Place, Suite 200
Santa Ana, California 92707

Dated at Saratoga, California, this 20th day of March 2014

By: James Madison Kelley
James Madison Kelley

Campbell, California
950089998
0568370100 -0095
03/20/2014 (800)275-8777 04:03:42 PM

Sales Receipt			
Product	Sale Unit	Final	
Description	Qty	Price	Price

@@ ~ SANTA ANA CA 92707 Zone-4		\$5.60
Priority Mail 2-Day		
Flat Rate Env		
3.40 oz.		
Expected Delivery: Sat 03/22/14		
USPS Tracking #:		
9114901159818298921774		
Includes \$50 insurance		

Issue PVI: \$5.60

Total: \$5.60

Paid by:
Debit Card \$5.60
Account #: XXXXXXXXXXXX7202
Approval #:
Transaction #: 600
23 903460129
Receipt#: 001823

@@ For tracking or inquiries go to
USPS.com or call 1-800-222-1811.

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